

# **EXHIBIT 1**

**From:** [Houghton-Larsen, M Annie](#)  
**To:** [Crowell, Nicholas P.](#); [Gottlieb, Michael](#); [Governski, Meryl Conant](#)  
**Cc:** [Ransom, Rollin](#); [Horner, James R.](#); [Everson, Katelin](#)  
**Subject:** RE: Drake v. UMG - Rule 11 Letter and Motion  
**Date:** Wednesday, February 19, 2025 3:34:38 PM

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**EXTERNAL EMAIL - Use caution with links and attachments.**

Counsel,

We are in receipt of your letter and draft motion and have considered UMG's position. Although we respectfully disagree with certain of the assertions you have made in your correspondence, Plaintiff nonetheless agrees to withdraw the allegation you have identified and correct it. We appreciate your conferral on this issue, and trust that this moots the relief sought by your letter and draft motion.

Thank you,

**M.Annie Houghton-Larsen**  
**Willkie Farr & Gallagher LLP**  
787 Seventh Avenue | New York, NY 10019-6099  
Direct: [+1 212 728 8164](tel:+12127288164) | Fax: +1 212 728 9164  
[mhoughton-larsen@willkie.com](mailto:mhoughton-larsen@willkie.com) | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)  
Pronouns: she, her, hers

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**From:** Crowell, Nicholas P. <ncrowell@sidley.com>  
**Sent:** Thursday, February 13, 2025 8:32 PM  
**To:** Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>  
**Cc:** Ransom, Rollin <rransom@sidley.com>; Horner, James R. <jhorner@sidley.com>; Everson, Katelin <keverson@sidley.com>  
**Subject:** Drake v. UMG - Rule 11 Letter and Motion

**\*\*\* EXTERNAL EMAIL \*\*\***

Counsel,

Please see the attached correspondence and motion.

Kind regards,

**NICHOLAS P. CROWELL**

**SIDLEY AUSTIN LLP**

+1 212 839 5449

[ncrowell@sidley.com](mailto:ncrowell@sidley.com)

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